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Attorneys for Movant, the ATD Group

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK, SALLIE
L. KRAWCHECK, GARY L. CRITTENDEN and
ROBERT DRUSKIN,

Defendants.

Civil Action No.
07 CIV 9901 (SHS)

LENNARD HAMMERSCHLAG, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, SALLIE
KRAWCHECK, and GARY CRITTENDEN,

Defendants.

No. 07 CIV 10258 (SHS)

**AFFIDAVIT OF ROGER W. KIRBY SUPPLYING EXHIBITS IN SUPPORT OF
THE MEMORANDUM OF THE ATD GROUP AND IN OPPOSITION TO THE
COMPETING MOTIONS FOR LEAD PLAINTIFF APPOINTMENT**

ROGER W. KIRBY, being duly sworn, says:

1. I am over the age of 18, a member of the bar of this court, and of the law firm of Kirby McInerney LLP, counsel for movants Edward and Elaine Altman, Jonathan Butler, M. David Diamond, and David and Henrietta Whitcomb (collectively “The ATD Group” or “Movant”). I submit this affidavit in support of the Movant’s motion for appointment as lead plaintiff and in opposition to the competing motions for lead plaintiff appointment. I have knowledge of the facts averred herein.

2. Attached hereto as the exhibits are true and complete copies of the following:

Exhibit A: Biography of David Whitcomb, Professor of Finance Emeritus of the Graduate School of Management of Rutgers, available online at <http://business.rutgers.edu/default.aspx?id=657>.

Exhibit B: Curriculum Vitae of Edward I. Altman, Max L. Heine Professor of Finance at New York University, available online at <http://pages.stern.nyu.edu/~ealtman/>.

Exhibit C: An article published January 17, 2008 by *The Wall Street Journal* entitled: “Wall St. rescue signals power shift”.

Exhibit D: List of the State Teachers Retirement System of Ohio Board Members.

Exhibit E: List of State Universities Retirement System of Illinois Board Members.

Exhibit F: List of the Tennessee Consolidated Retirement System Board Members.

Exhibit G: List of the Public Employees' Retirement Association of Colorado Board Members.

Exhibit H: List of the Fjarde AP-Foden Board Members.

Exhibit I: List of the Sjunde AP-Fonden Board Members.

Exhibit J: Lead Plaintiff Order in *In re Dell, Inc. Sec. Litig.*, No. 06-Civ-726 (W.D. Tex.), dated April 9, 2007.

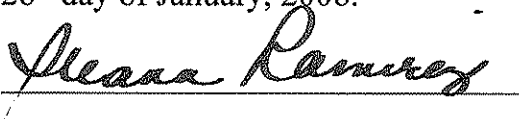
Exhibit K: Lead Plaintiff Order in *In re Pfizer Sec. Litig.*, 233 F.R.D. 334 (S.D.N.Y. 2005).

Exhibit L: Lead Plaintiff Order in *In re UnitedHealth Group Inc. PSLRA Litig.*, No. 06-1691 (D. Minn.), dated September 14, 2006.



ROGER W. KIRBY

Sworn to before me this
28th day of January, 2008.



Notary Public

ILEANA RAMIREZ
Notary Public, State of New York
No. 01RA4740575
Appointed in Bronx County
My Commission expires 8/31/2009